

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION**

<b>UNITED STATES OF AMERICA,</b>	)	
	)	
<b>Plaintiff,</b>	)	
<b>v.</b>	)	<b>Case No. 2:24-cv-02101</b>
	)	
<b>STATE OF TENNESSEE, and</b>	)	<b>Chief Judge Sheryl H. Lipman</b>
<b>TENNESSEE BUREAU OF</b>	)	
<b>INVESTIGATION,</b>	)	<b>Chief Magistrate Judge Tu M. Pham</b>
	)	
<b>Defendants.</b>	)	

---

**DEFENDANTS' MOTION TO STAY**

---

Defendants move the Court to stay proceedings until July 15, 2024, in light of the General Assembly's recent amendment of many of the statutes that are at the core of the federal government's claims. Counsel for the federal government opposes a stay. But the federal government will not be prejudiced by a stay, and both the parties and the Court will save time and resources. For the reasons set forth in the accompanying memorandum of law, the Court should enter a stay of proceedings until July 15, 2024, at which time the parties can inform the Court whether and how litigation will resume.

Respectfully submitted,

JONATHAN SKRMETTI  
ATTORNEY GENERAL & REPORTER

/s/ Cody N. Brandon  
CODY N. BRANDON (BPR# 037504)  
Managing Attorney  
Assistant Attorney General

DAVID RUDOLPH (BPR# 13402)  
Senior Assistant Attorney General

JOHN R. GLOVER (BPR #037772)  
Assistant Attorney General

Office of the Tennessee  
Attorney General and Reporter  
P.O. Box 20207  
Nashville, Tennessee 37202  
Ph. (615) 532-7400  
Fax (615) 532-4892  
Cody.Brandon@ag.tn.gov  
John.Glover@ag.tn.gov  
David.Rudolph@ag.tn.gov

**CERTIFICATE OF SERVICE**

I hereby certify that on March 29, 2024, the foregoing was filed and served via the Court's electronic filing system on:

Stephanie Berger  
Ali Szemanski  
U.S. Department of Justice  
150 M Street NE  
Washington, DC 20002

/s/ Cody N. Brandon  
CODY N. BRANDON